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Attorney for Defendants
ROLLIT, LLC, REX PRODUCTS INC.,
MK ENTERPRISES, INC., and
MAURICE KANBAR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE DIVISION)

3M COMPANY,

Plaintiff,

v.

MAURICE KANBAR, MK ENTERPRISES
INC., ROLLIT, LLC, and REX PRODUCTS
INC.,

Defendants.

Case No. C 06-01225 JW (HRL)

**STIPULATION AND PROPOSED ORDER
RE DISCLOSURE OF CONFIDENTIAL
SETTLEMENT AGREEMENTS**

WHEREAS, Plaintiff 3M COMPANY (hereinafter "Plaintiff" or "3M") and certain third parties, including Print Inform GmbH & Co., Taiwan Hopax Chemicals Mfg., Co. Ltd., Beautone

1 Specialities Co. Ltd., and Janel have entered into confidential settlement agreements concerning
2 the use of the color yellow on sticky notes;

3 WHEREAS, by the terms of those agreements 3M is prohibited from disclosing those
4 agreements to any person absent a valid subpoena or court order;

5 WHEREAS, Defendants MAURICE KANBAR, MK ENTERPRISES INC., ROLLIT,
6 LLC, and REX PRODUCTS INC., have served a Request For Production of Documents
7 demanding the production of those agreements;

8 NOW, THEREFORE, IT IS HEREBY STIPULATED and agreed by and between Plaintiff
9 and Defendants that Plaintiff will produce those agreements upon the Court's execution of this
10 Stipulation and Order. Those agreements will be produced under the "CONFIDENTIAL—
11 COUNSEL ONLY" designation under the terms of the Protective Order [Doc. No. 65], and access
12 to those agreements will be limited as set forth in the Protective Order.

13 **STIPULATED AND AGREED TO BY:**

14 DATED: May 2, 2007

FISH & RICHARDSON P.C.

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16 By: 
17 JOEL LEVITON
18 Attorneys for Plaintiff
19 3M COMPANY
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1 DATED: May 2, 2007

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3 By: 

4 MICHELLE L. LANDRY

5 Attorney for Defendants

6 MAURICE KANBAR, MK ENTERPRISES INC.,
ROLLIT, LLC, and REX PRODUCTS INC.,

7 PURSUANT TO STIPULATION, IT IS SO ORDERED:

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9 DATED: May 3, 2007.

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12 United States Magistrate Judge
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